

EXHIBIT 24

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Case No. 11 Civ. 0691 (LAK)

5 -----x
6 CHEVRON CORPORATION,
7 Plaintiff,
8 - against -
9 STEVEN DONZIGER, et al.,
10 Defendants.
11 -----x

12 June 27, 2018
13 4:13 p.m.

14 DEPOSITION of JOSH RIZACK, held at
15 the offices of Gibson, Dunn & Crutcher LLP,
16 located at 200 Park Avenue, New York, New
17 York 10166, before Anthony Giarro, a
18 Registered Professional Reporter and a
19 Notary Public of the State of New York.
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25

1 JOSH RIZACK

2 Q And could you describe
3 briefly for me your educational
4 background?

5 A My last --

6 Q You could start with
7 college. How about that?

8 A I went to New York
9 University, got a degree in economics.

10 Q What year did you graduate
11 NYU?

12 A 1988.

13 Q Have you had any studies
14 after graduating NYU in 1988?

15 A Not at a university, no.

16 Q Any studies relevant to your
17 practice as an accountant?

18 A I'm not an accountant.

19 Q Any studies relevant to your
20 professional practice?

21 A I've attended conferences
22 and, you know, workshops and so forth.

23 Q Any other degrees other than
24 your degree in economics?

25 A No.

1 JOSH RIZACK

2 that.

3 Do you consider what you
4 produced to be accountings?

5 A No. I mean I didn't produce
6 in the formal sense any income statements
7 or balance sheets or formal GAAP
8 accounting. It was more putting together
9 what bills needed to be paid, what was
10 outstanding and putting together the
11 expenses of the case and Steven
12 Donziger's expenses related to the case.

13 Q In doing so -- when you say
14 the case, you mean the Ecuador case?

15 A Correct.

16 Q In doing this work for
17 Mr. Donziger related to the case, did you
18 work with anyone other than Mr. Donziger?

19 A I would say predominantly,
20 the work was with Mr. Donziger. On other
21 occasions, I know there was -- and I
22 don't recall her name and when. But
23 there was a woman that helped put a lot
24 of this data together; you know, I think
25 she was a, you know, temp that would, you

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2 A Restate the question.

3 Q Did you ever have or do you
4 have a contingent interest in the Ecuador
5 judgment?

6 A Yes.

7 Q Could you describe that
8 interest for me, please, sir?

9 A I believe it's either an
10 eighth or a quarter percent of
11 recoveries.

12 Q But you don't know which:
13 An eighth or a quarter?

14 A No. I would have to check.

15 Q Do you have a document?

16 A Yes.

17 Q Did you produce that
18 document?

19 A I don't believe so.

20 MR. DONZIGER: I'm going to
21 object to the production of that,
22 which we'll deal with later,
23 obviously, because he doesn't have
24 it. But getting into issues of who,
25 you know, owns what other than like a

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2 physically there. But generally,
3 I've seen -- you know, obviously,
4 I've seen his summary. And if I --
5 if I testify that it was accounting,
6 I'm probably misusing the word a bit
7 myself because it depends on how you
8 define it, obviously. These aren't
9 like official accounting an
10 accountant would do. The witness
11 testified he's not an accountant. He
12 does have professional skill, though,
13 in this kind of work in terms of
14 numbers and, you know, trying to
15 reconcile accounts and all that
16 stuff. But I just think we need to
17 be clear about what this is. I don't
18 think it's an official accounting.

19 MS. NEUMAN: Okay. But when
20 you referred to a substantially
21 complete accounting, even if you
22 slightly misused the word, you were
23 referring to Mr. Rizack's work?

24 MR. DONZIGER: That is not
25 my deposition. But I will give you

1 JOSH RIZACK

2 the courtesy of an answer. Yes, I
3 was, and also Ms. Sullivan subsequent
4 to that.

5 MS. NEUMAN: Oh. Her work.
6 Sorry. I was thinking about her
7 testimony. And I was confused.

8 MR. DONZIGER: Yes.

9 MS. NEUMAN: I understand
10 what you're saying.

11 MR. DONZIGER: Yeah.

12 Q Mr. Rizack, are you aware of
13 any occasions on which post the RICO
14 judgment where there was funder money
15 that had been obtained but it was
16 directed into someone else's account for
17 the benefit of Mr. Donziger as opposed to
18 one of his TD accounts, say to his wife's
19 account, for example? Anything like
20 that?

21 A I don't know where the
22 money, post-funding, where it went to.

23 Q Do you know how much it was?

24 A No.

25 Q Do you have any information

C E R T I F I C A T I O N

I, ANTHONY GIARRO, a Shorthand
Reporter and a Notary Public, do hereby
certify that the foregoing witness, JOSH
RIZACK, was duly sworn on the date
indicated, and that the foregoing, to the
best of my ability, is a true and accurate
transcription of my stenographic notes.

I further certify that I am not
employed by nor related to any party to
this action.



ANTHONY GIARRO